

# Virginia & Ambinder, LLP

40 Broad Street  
7th Floor  
New York, NY 10004

**Invoice submitted to:**

Abitinos Pizza

June 9, 2020

Invoice #15167

Professional Services

		Hours	Amount
3/19/2019 IC	Telephone conference with MM in regard money delay/ scan documents send them to NA brief Office conf w/NA in regard the same	0.20	
4/9/2019 IC	Email message from/to and re: to MM includes email to client	0.30	
4/12/2019 IC	Telephone conference with vm to Aureliano in regard status of the case	0.10	
4/23/2019 MM	Email D counsel re late settlement payments	0.10	
4/24/2019 MM	Draft motion to enforce settlement; perform legal research re same; office conf w/ IC re client questions	2.00	
IC	Telephone conference with client Aureliano, Office conf w/MM and JM / additional call to client and Office conf w/MM	0.70	
4/26/2019 IC	Email message from/to and re: to client ernesto	0.10	
5/1/2019 IC	Email message from/to and re: translation of email sent by Ernesto. includes draft email for MM	0.30	
5/7/2019 MM	Email IC responding to client questions re late settlement payments; email to D counsel re late payments	0.30	
5/8/2019 IC	Email message from/to and re: client Ernest/ traducion of email to client	0.60	
5/13/2019 MM	Draft motion to enforce settlement	1.40	
5/15/2019 MM	Email D counsel re outstanding settlement	0.10	
MM	Draft motion to enforce settlement and send to MN for filing	0.20	
MN	Efiled Motion to Enforce Settlement Agreement	0.20	
5/16/2019 MM	Call ECF help desk re motion to enforce settlement issues	0.20	
MN	Docket re: downloaded, named and saved 2019-5-16 Order Scheduling Status Conf	0.10	
MN	Calendar re: 5/30 Status Conf	0.10	
MN	Redacted confidential information from MOL; emailed MM re same	0.20	
MN	Efiled redacted MOL for Motion to Enforce Settlement Agreement	0.20	
5/22/2019 MN	Calendar re: Consulted court docket for week of 5/27 - 5/31, compared court calendar with firm calendar. Updated firm calendar after consulting docket to confirm accuracy.	0.10	
5/24/2019 MN	Calendar re: Consulted court docket for week of 5/27 - 5/31, contacted attorney and recorded response.	0.10	
5/30/2019 JM	Court conf. re: failure to timely pay	3.30	
MN	Calendar re: 7/24 Status Conf	0.10	
6/4/2019 MM	Telephone conf w/ IC and client re status of unpaid settlement	0.20	
IC	Telephone conference with Aureliano in regard status of the case, includes Office conf w/MM	0.30	
6/6/2019 IN	scan/save of discovery documents	1.20	
7/19/2019 MN	Calendar re: Consulted court docket for week of 7/22 - 7/26, compared court calendar with firm calendar. Updated firm calendar after consulting docket to confirm accuracy. Contacted attorney and recorded response.	0.20	
7/22/2019 IN	scan/save/file of returned mail	0.10	
IC	Telephone conference with JM and email to Ernesto	0.20	
7/24/2019 MM	Email IC update on status of case/settlement payments	0.10	

			Hours	Amount
7/24/2019	JM	Court conference re: status of payment	1.80	
	MN	Calendar re: 9/26 Status Conference	0.10	
8/2/2019	IC	Email message from/to and re: translate information of the case to clients	0.30	
8/14/2019	MM	Attn to email from D counsel re allocation; email ND re creating allocation for first \$5,000 payment	0.20	
8/19/2019	MM	Meeting with client re settlement status; email allocation to D counsel	0.20	
	IC	Client matter re: brief meeting w/client, email to MM	0.30	
9/11/2019	PP	Prepared documents to be send to storage	0.20	
9/17/2019	MM	Email D counsel to follow up on status of payment	0.10	
	IC	Client matter re: email to Ernesto, includes Office conf w/ MM	0.10	
9/20/2019	MN	Calendar re: Consulted court docket for week of 9/23 - 9/27, compared court calendar with firm calendar. Updated firm calendar after consulting docket to confirm accuracy. Contacted attorney and recorded response.	0.20	
9/23/2019	IC	Attended office conference with MM	0.10	
9/24/2019	MM	Review last court order in preparation for drafting status letter; email IC re check distributions; email D re payment plan and conference	0.40	
9/25/2019	IC	Telephone conference with client Aureliano in regard checks	0.20	
9/26/2019	JM	Court conference w/ Magistrate Parker re: settlement payment status	0.80	
	IC	Email message from/to and re: client Ernesto in regard status of the check	0.10	
	PP	Calendar re: Date in regards to the 2019-9-26 status conf order re settlement update letter	0.20	
9/27/2019	AV	Assisted clients who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20	
10/25/2019	IC	Email message from/to and re: to client and MM	0.20	
10/28/2019	MM	Email to D counsel re update on settlement payments in preparation for drafting status report to Court	0.10	
10/29/2019	MM	Send follow up email to D counsel re status of payments in advance of drafting status report to Court	0.10	
10/30/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20	
	MM	Draft status letter to Court and send to JM for review; emails to D counsel; emails to/from IC re settlement checks	0.30	
	IC	Telephone conference with call to 7 clients, includes vms. Office conf w/NA and MM , and emails w/MM	1.00	
10/31/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20	
	AV	Called clients with information about the checks that were distributed per MM	0.30	
	MM	Revise status letter to Court based on additional payment received today and issues with bounced checks; emails to/from D counsel re same; attn to clients and bounced check concerns	0.60	
	PP	Efiled Joint Status Report	0.30	
	IC	Telephone conference with MM , call Aureliano, vm to Ernesto, email to JM and MM , (18) attempt to Miguel Tadeo but wrong phone number, vm to Segundo and to Annabelle , Luis Calle (hang up), Cesar Mendez no possible to leave vm. and able to speak with Anayelly Rosas	0.50	
11/1/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20	
	IC	Attended office conference with MM in regard clients / includes letters to clients, mailing process , copy , scan saved into the system email to MM	1.00	

		Hours	Amount
11/4/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20
	AV	Billing on timeslips for Courtlink - Invoice #: EA- 830940	0.20
	IC	Telephone conference with Luis Calle	0.10
11/5/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20
	MM	Meeting w/ client re settlement issues	0.80
	IC	Client matter re: w/ Aureliano, and MM includes additional Office conf w/MM in regard clients contact information and email to AV NA	0.60
11/7/2019	MM	Attn to issue with bounced settlement checks; email D counsel re same	0.20
11/8/2019	IC	Office conf w/ MM, includes search for Miguel's PoA , email to the group	0.60
11/11/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20
11/13/2019	MM	Attn to issues w/ bounced settlement checks; email D counsel re same	0.30
	IC	Email message from/to and re: emails to MM, to client Office conf w / MM/ call to Ernesto includes Office conf w/ Mm	0.50
11/14/2019	MM	Attn to issues re bounced checks- emails to/from D counsel; email to VA team re tracking status of checks from clients	0.10
	IC	Telephone conference with client call Luis Osorio, Office conf w/ MM (12) client coming in , Cesar Mendez, includes Office conf w/NA, MM and JM (18) call to clients, do chart, in regard checks, bounced checs etc.	1.20
11/15/2019	IC	Telephone conference with Segundo Neciosup includes emails to MM (18) emails Ernesto (12)	0.50
11/18/2019	IC	Telephone conference with Cesar in regard checks	0.10
11/19/2019	MM	Review IC notes re client check status; draft email to D counsel updating	0.30
	IC	Email message from/to and re: call to client Calle, to Mateo, Ernesto, emails to Ernesto and Mateo, vm to Aureliano, draft email and chart to MM	0.80
11/20/2019	MM	Draft status letter to Court	0.40
	IC	Email message from/to and re: MM	0.10
11/26/2019	MM	Revise status letter to Court and send to D counsel for review	0.20
11/27/2019	MM	Emails to/from D counsel re status letter and settlement payment; revise letter and file	0.20
12/2/2019	IC	Email message from/to and re: to Ernesto and MM	0.20
12/3/2019	IN	Client matter re: met with Segundo R. Nesciosup . He picked up 2 checks. scan/save of checks, email to NAD	0.10
12/9/2019	IN	Telephone conference with Anayelly Rosas regarding bounced check. email to MM regarding bounced check for Anayelly Rosas	0.10
	IN	0.10	
12/10/2019	IC	Email message from/to and re: to client and MM in regard update	0.20
12/11/2019	IC	Email message from/to and re: email to MM , gather contact info from clients	0.20
12/17/2019	IC	Telephone conference with Aureliano and MM/ call client Luis, vm to Annabelle, and email and vm to Ernesto Villegas, includes additional Office conf w/MM and NA, call from ernesto	0.70
12/18/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20
12/19/2019	AV	Assisted client who picked up check, made a copy of ID and check. After client signature, scanned copies and sent to NA for our records	0.20
12/23/2019	MM	Call to client re replacement check; email D counsel; make copy of check and send to ND	0.20
12/27/2019	MM	Draft status letter to Court	0.20
1/9/2020	IC	Attended office conference with MM in regard update	0.10
1/14/2020	IC	Drafted translate email to MM from client, brief Office conf w/ MM	0.40

			Hours	Amount
1/15/2020	IC	Email message from/to and re: client Ernesto in regard email sent yesterday	0.10	
1/21/2020	MM	Respond to client questions via email to IC	0.40	
	IC	Telephone conference with Cesar in regard status of the payment, additional Office conf w/ MM in regard calling client both of us	0.20	
1/22/2020	MM	Prepare for and call w/ clients	0.70	
	IC	Telephone conference with call w/ Ernesto in regard status of the case, includes Office conf w/ MM	0.40	
1/28/2020	MM	Draft letter motion to request conference and update court	0.30	
	IC	Attended office conference with MM about brief update	0.10	
1/29/2020	PP	Calendar re: Status Conf. Date 3/16	0.20	
2/4/2020	IC	Email message from/to and re: MM and to client Ernesto	0.20	
3/1/2020	IC	Telephone conference with Luis Calle	0.20	
3/11/2020	PP	Calendar re: Updated Conf on 3/16 to telephone conf. per court order	0.20	
3/13/2020	MM	Draft summary of Abitino settlement proceedings and issues to date for JM in preparation for telephone conf w/ Court	0.40	
3/16/2020	MM	Prepare for conduct telephone conf w/ Court re status of settlement issues; telephone conf w/ D counsel re same	0.50	
	IC	Email message from/to and re: MM in regard received update	0.10	
3/30/2020	IC	Telephone conference with search for update, call client, email to mm and email to AV, attention to MM email and answer	0.40	
5/16/2020	IC	Email message from/to and re: MM JM and email to client	0.20	
5/18/2020	IC	Email message from/to and re: emai to MM (6) review and translation email sent by MM , sent email to client	0.80	
5/26/2020	MM	Draft motion for default of settlement agreement	6.90	
<b>For professional services rendered</b>				<b>46.80 \$10,427.50</b>

## Additional Charges :

3/21/2019	\$Legal Research Courtlink - Invoice #EA-805329	0.20
3/28/2019	\$Legal Research Courtlink - Invoice #: EA- 801026	2.43
3/29/2019	\$PACER fee Pacer Invoice #: 5741258-Q42018	1.90
	\$PACER fee Pacer Invoice #: 5731926-Q42018	14.20
5/1/2019	\$Legal Research Lexis Nexis 3091894879	30.18
	\$Legal Research Lexis Nexis 3091894879	17.46
	\$Legal Research Lexis Nexis 3091894879	29.99
6/3/2019	\$Legal Research Lexis Nexis - Invoice 3091991237	17.70
6/7/2019	\$Transcript fee Southern District Repoters	92.46
6/18/2019	\$Legal Research Lexis Nexis - Invoice 3092035129	7.58
6/20/2019	\$Legal Research Courtlink - Invoice #: EA- 814113	0.44
10/24/2019	\$PACER fee Pacer Fee - Invoice #5741258-Q32019	2.40

	<u>Amount</u>
1/15/2020 \$Legal Research Lexis Nexis 3092232640	0.58
2/26/2020 \$Legal Research Courtlink - Invoice #: EA- 841851	0.11
5/21/2020 \$Legal Research LexisNexis invoice #EA-844802	0.37
<b>Total costs</b>	<b>\$218.00</b>
 <b>Total amount of this bill</b>	 <b>\$10,645.50</b>

Name	Attorney Summary	
	Hours	Rate
James Murphy	5.90	450.00
Michele Moreno	7.80	275.00
Michele Moreno	10.90	250.00
Ana Valerio	2.30	125.00
Ines Cruz	1.70	200.00
Ines Cruz	13.90	125.00
Marta Nadgorska	1.60	125.00
Paige Piazza	1.10	125.00
Iwona Ner	1.60	125.00